

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
LINDA BAKER

07-CV-5621 [LAP]

Plaintiff,  
-against-

**PLAINTIFF' S  
INTERROGATORIES  
ADDRESSED TO  
DEFENDANT**

PORT AUTHORITY TRANS-HUDSON CORPORATION

Defendant.

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In accordance with the Rules of Civil Procedure, you are directed to answer the following Interrogatories under oath and serve same on plaintiff's counsel of record. These Interrogatories are deemed ongoing and in the event any further information is discovered in any way, you are directed to supplement your answers to these Interrogatories and serve same on plaintiff's counsel of record.

1. State in detail all information known to you regarding the facts leading to and of the occurrence of the accident.

2. State when this accident first came to the attention of defendant or any representatives of defendant, by whom it was reported and to whom it was reported.

3. Were any safety rules set forth by you which in any way deal with or concern the incident upon which this cause of action is based? If so, state in detail what these safety measures and rules were.

4. State when inspections were made last preceding and first following this accident of the equipment, area and/or instrumentalities involved herein, giving the names, addresses and job classifications of the persons making each inspection.

5. Name the eyewitnesses to all or any part of the accident and their location at the time thereof.

6. Name all persons who were at or near the scene or who arrived at the scene within three hours after the occurrence.

7. State whether you have within your possession or control any photographs, plans or diagrams of the scene, the equipment or component parts and/or objects connected with the occurrence and identify them, and attach copies hereto.

8. State whether any alterations, repairs or replacements were made to the equipment, area and/or instrumentalities involved herein for a period of six months prior to and six months subsequent to the accident and, if so, state the nature and dates thereof, and attach copies of reports hereto.

9. State whether any notice was given or complaints made relating to the equipment, area and/or instrumentalities involved prior to the occurrence. If so, state the nature and dates thereof, and attach copies of reports hereto.

10. Identify any first-aid or medical attention given to plaintiff as a result of the injuries that plaintiff sustained in the subject accident, and attach copies of records of that treatment hereto.

11. If defendant claims plaintiff suffered any injuries, sickness, disease or abnormality of any kind prior to the accident alleged in this action involving any part or function of the body claimed in this suit to have been injured, set forth the date and nature of such prior condition, and attach copies of records pertaining to that condition hereto.

12. State whether plaintiff's accident was caused by any broken, defective or unworkable devices or by the breaking, absence, misplacement or malfunction of any structure, gear or any similar conditions and identify same.

13. According to the defendant's records, how much time from work has plaintiff lost since this accident, computed up to the date of your answer?

14. State how much plaintiff's gross earnings were, according to defendant's records, for each of the two full years preceding

the year of his accident and for the year of his accident up to the date of accident.

15. If any disciplinary action was taken against the plaintiff from three years prior to the occurrence up to the present time, specify the nature of said action, the dates thereof and, if any report, record or memoranda exist relating thereto, describe same and state the name, address and job classification of the person having custody of same, and attach copies hereto.

16. If plaintiff submitted to any physical examinations in connection with employment by you either prior to or subsequent to the commencement of his employment, state as to each examination the date, place and identity of the examiner, and attach copies of any reports of the examination hereto.

17. State whether any surveillance of plaintiff or an investigation of neighborhood, friends, acquaintances, employers (past and present) and/or fellow employees (past and present) was conducted by or on behalf of defendant or had been made available to the defendant and identify the individuals contacted.

18. If you contend that plaintiff's conduct contributed in any way to his accident and injury, set forth all of the factual information upon which you base a claim, and set forth the name,

address, home telephone number and job classification of each person who supplied you with information that supports this contention.

19. If you contend that the conduct of anyone other than plaintiff contributed in any way to plaintiff's accident and injury, set forth all the factual information on which you base such claims and set forth the name, address, home telephone number and job classification of each person who supplied you with information that supports this contention.

20. State the names and addresses of all persons, including this plaintiff and/or his representatives, from whom you have signed, written, recorded or transcribed statements relating to the occurrence, setting forth the date of such statements, the person who secured them and the names and addresses of all custodians thereof, and attach copies of the statements hereto.

21. Identify each person whom you expect to call as an expert witness at trial and state the subject matter on which the expert is expected to testify, the substance of the facts and opinions to which the expert is expected to testify and a summary of the grounds for each opinion.

22. State the names and addresses of any persons, not heretofore mentioned, having personal knowledge of relevant facts material to this case.

23. State the name, address and job description of any persons preparing reports or investigations of this accident, and attach copies hereto.

24. List the names of those persons who appear in the five positions above and below plaintiff on his appropriate job roster and the earnings for each for the two years prior and subsequent to the date of plaintiff's accident.

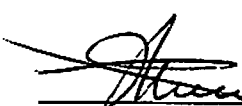
25. Identify any documents you relied on in answering these interrogatories and attach copies hereto.

Dated: August 22, 2007  
New York, NY

Yours etc,

Michael H. Zhu, Esq. PC  
Attorneys for  
Plaintiff Linda Baker

By:

  
Michael H. Zhu

14 Wall Street - 22nd Floor  
New York, New York 10005-1198  
(212) 227-2245

**AFFIRMATION OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing Plaintiff's Interrogatories Addressed to defendant was served by first-class mail, postage prepaid, upon:

Angela Calamia, Esquire  
225 park Avenue South, 13<sup>th</sup> Floor  
New York, New York 10003

on this 22nd day of August, 2007.

Michael H. Zhu, Esq. PC  
Attorneys for  
Plaintiff Linda Baker

By: 

Michael H. Zhu

14 Wall Street - 22nd Floor  
New York, New York 10005-1198  
(212) 227-2245

Index No. Year RJ1 No. Hon.

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Plaintiff,

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PORT AUTHORITY TRANS HUDSON CORPORATION

Defendants.

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**PLAINTIFF'S INTERROGATORIES ADDRESSED TO DEFENDANT**

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MICHAEL H. ZHU, ESQ.

*Attorneys for Plaintiff Linda Baker*

*Office and Post Office Address, Telephone*

14 WALL STREET, 22<sup>ND</sup> FLOOR  
NEW YORK, N.Y. 10005  
(212) 227-2245

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To

Signature (Rule 130-1.1-a)

.....  
Print name beneath

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Attorney(s) for

Service of a copy of the within

is hereby admitted.

Dated,

.....  
Attorney(s) for

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Please take notice

☐ **NOTICE OF ENTRY**

that the within is a (*certified*) true copy of a  
duly entered in the office of the clerk of the within named court on

☐ **NOTICE OF SETTLEMENT**

that an order  
settlement to the HON.  
of the within named court, at  
on

of which the within is a true copy will be presented for  
one of the judges

at

M

Dated,

Yours, etc.  
MICHAEL H. ZHU, ESQ.  
*Attorneys for plaintiff Linda Baker*  
*Office and Post Office Address*  
14 WALL STREET, 22<sup>ND</sup> FLOOR  
NEW YORK, N.Y. 10005

To

Attorney(s) for